

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**ROBERT E. BELUE, et al.,
vs. ASBESTOS DEFENDANTS:
A.O. SMITH ELECTRICAL PRODUCTS, et. al.**

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

ROBERT E. BELUE, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.
2:06-CV-1034-WKW

ASBESTOS DEFENDANTS:
A.O. SMITH ELECTRICAL PRODUCTS, et al.,

Defendants.

**JOINDER AND ADOPTION IN RAPID AMERICAN CORPORATION'S MOTION TO
DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND
FOR MORE DEFINITE STATEMENT**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation and hereby join in and adopt as though fully set forth Rapid American's Motion to Dismiss, or in the Alternative, Motion to Sever and For More Definite Statement filed herein on February 11, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation respectfully request this Honorable Court to grant Rapid American's Motion to

Dismiss, or in the Alternative, Motion to Sever and For More Definite Statement filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 10th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher (FLE 019)

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Elizabeth B. Padgett (PAD015)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.
Law Offices of G. Patterson Keahey, P.C.
One Independence Plaza, Suite 612
Birmingham, AL 35209

This 10th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher

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